

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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DATE FILED: OCT 15 2018

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UNITED STATES OF AMERICA :

- v. - :

FARIDA RADJABOVA, :

Defendant. :

SEALED SUPERSEDING INDICTMENT  
S7 18 Cr. 509 (GBD)

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**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

The Grand Jury charges:

The Scheme to Defraud

1. From at least in or about November 2016, up to and including the present, FARIDA RADJABOVA, the defendant, and others known and unknown, participated in a scheme to defraud victims seeking to purchase goods on various internet websites that advertised those goods for sale. In particular, members of the conspiracy placed on internet websites advertisements for the sale of various high-value goods, primarily classic cars.

2. Victims who responded to the advertisements were engaged by conspirators who negotiated sale prices for the advertised goods and then directed victims to purported transportation companies, telling the victims that those companies would receive payment and arrange for delivery of the advertised goods. When victims

contacted the transportation companies, they were directed to send payment, typically by wire transfer, to specified bank accounts.

3. The specified bank accounts to which victims of this scheme were directed were opened by scheme participants and held in the names of shell companies established by scheme participants, or in the names of the scheme participants themselves.

4. After victims wired payment to the specified bank accounts, the conspirators ceased communication with the victims, who never received the goods they purportedly purchased and for which they were transmitting payment to the specified bank accounts.

5. Shortly after receiving the victims' wires, conspirators withdrew the fraudulent proceeds from the specified bank accounts, typically through structured withdrawals designed to avoid transaction reporting requirements. Conspirators then sent a portion of the cash proceeds overseas via a money services business, such as MoneyGram and Western Union, to other scheme participants located in Eastern European countries.

#### Statutory Allegations

6. From at least in or about November 2016, up to and including the present, in the Southern District of New York and elsewhere, FARIDA RADJABOVA, the defendant, and others known and unknown, willfully and knowingly did combine, conspire,

confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

7. It was a part and object of the conspiracy that FARIDA RADJABOVA, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
**(Conspiracy to Commit Money Laundering)**

The Grand Jury further charges:

8. The allegations contained in Paragraphs 1 through 5 are repeated and realleged as if fully set forth herein.

9. From at least in or about November 2016, up to and including the present, in the Southern District of New York and elsewhere, FARIDA RADJABOVA, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit money

laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

10. It was a part and an object of the conspiracy that FARIDA RADJABOVA, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, the wire fraud conspiracy charged in Count One of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

**FORFEITURE ALLEGATION**

11. As a result of committing the offense alleged in Count One of this Indictment, FARIDA RADJABOVA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2), any and all property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly as a result of the commission of said offense, including but not limited to a sum of money in United

States currency representing the amount of proceeds traceable to the commission of said offense.

12. As a result of committing the offense alleged in Count Two of this Indictment, FARIDA RADJABOVA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real or personal, involved in said offense, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

SUBSTITUTE ASSET PROVISION

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

FARIDA RADJABOVA,

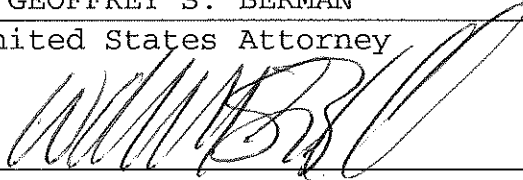
Defendant.

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SEALED SUPERSEDING INDICTMENT  
S7 18 Cr. 509 (GBD)

(18 U.S.C. §§ 1349 and 1956(h))

GEOFFREY S. BERMAN  
United States Attorney



Foreperson

10/15/18

Filed Indictment under seal  
Arrest warrant issued

USAT Gorenstein

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